NORLITE CORPORATION

628 SO. SARATOGA STREET
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August 13, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 07/17/12- 08/08/12
Kiln 2: 07/17/12- 08/08/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 07/17/12 thru 08/08/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs had causes associated with high LGF Line Pressure. High LGF Line Pressure made fuel flow control difficult which resulted in fuel flow surges which caused pressure pulses in the kiln system. The pressure pulses thus affected the Rear Chamber system and caused a cutoff to occur. Norlite made adjustments to the Rear Chamber control system to try to better accommodate the pressure pulses in the kiln system. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically. Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
07/17/12 - 08/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
7/19/2012	14:07:28	7/19/2012	14:07:49	0:00:21	106	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
7/21/2012	6:08:44	7/21/2012	6:36:04	0:27:20	107	Malfunction	End of Burn Tank Reached Which Caused a LGF Flow Surge Which Triggered the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Switched Tanks and Adjusted Fuel Flow
7/30/2012	18:13:13	7/30/2012	18:14:56	0:01:43	108	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
7/30/2012	23:48:08	7/30/2012	23:50:45	0:02:37	109	Malfunction	Stack Gas Probe Was Dirty Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	I&E Cleaned Probe
7/31/2012	19:41:57	7/31/2012	19:42:32	0:00:35	110	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
07/17/12 - 08/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
7/18/2012	8:49:46	7/18/2012	8:50:13	0:00:27	297	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/19/2012	14:08:11	7/19/2012	14:09:34	0:01:23	298	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
7/30/2012	1:59:22	7/30/2012	2:00:18	0:00:56	299	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
7/30/2012	2:05:14	7/30/2012	2:07:41	0:02:27	300	Malfunction	The LGF Pump Stopped Which Caused a LGF Fuel Flow Surge Which Caused the Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Re-Started the LGF Pump and Adjusted Fuel Flows
7/30/2012	2:08:07	7/30/2012	2:10:59	0:02:52	301	Malfunction	The LGF Pump Stopped Which Caused a LGF Fuel Flow Surge Which Caused the Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Re-Started the LGF Pump and Adjusted Fuel Flows
7/30/2012	4:26:05	7/30/2012	5:28:00	1:01:55	302	Malfunction	The Used Oil Flow Surged Which Caused A Sudden Increase in the Flame Which Caused the CO's to Rise	Carbon Monoxide	Opl	Adjusted Fuel Flow
8/1/2012	19:30:39	8/1/2012	19:39:10	0:08:31	303	Malfunction	The End of the Burn Tank was Reached Which Caused a LGF Fuel Flow Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
8/3/2012	19:51:53	8/3/2012	20:56:50	1:04:57	304	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions / High CO's	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/3/2012	22:02:34	8/3/2012	22:03:43	0:01:09	305	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/3/2012	22:33:57	8/3/2012	22:34:19	0:00:22	306	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow

8/3/2012	22:36:17	8/3/2012	22:36:39	0:00:22	307	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/4/2012	0:48:51	8/4/2012	0:50:07	0:01:16	308	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/7/2012	0:30:25	8/7/2012	0:30:52	0:00:27	309	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Casued a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow